

FILED

AUG 09 2023

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF TEXAS AUSTIN DIVISION**

U.S. BANKRUPTCY COURT
BY _____ DEPUTY

In re:

三

Chapter 7

ASTRALABS, INC.
Debtor

238

Case No. 23-10164-SMR

RESPONSE TO ANDREW RYAN'S OMNIBUS OBJECTION TO CLAIMS (INTERESTS)

United States Bankruptcy Clerk
Western District of Texas
903 San Jacinto Blvd., Suite 322
Austin, TX 78701

I, Fernando Moreno Cortina, am writing this response to address Andrew Ryan's Omnibus Objection to my claim in the bankruptcy case of ASTRALABS, INC. I submitted my claim to ensure that a record of my ownership in shares and stock options is maintained, considering the uncertainty surrounding the accuracy of the cap table for Astralabs. Moreover, I believe that the ongoing liquidation process qualifies as a liquidity event, making me a beneficiary and a creditor.

Claimant	Claim#	Amount	Reason for Objection
Fernando Moreno Cortina	406	\$1,391,099	Employee Stock Grant
Fernando Moreno Cortina	407	\$131,472	Employee Stock Grant

Here is a detailed list explaining my aforementioned points:

1. Importance of Claim Submission: My intention in filing the claim was to secure my rightful stake in Astralabs during the bankruptcy proceedings. As an equity holder, it is crucial for me to establish my interest in the company. The claim submission serves as evidence of my ownership, ensuring that my interests are protected and accounted for appropriately.
2. Lack of Updated Cap Table: I am aware that the cap table for Astralabs is not updated, which has raised concerns about the accuracy of shareholder information. Given this uncertainty, submitting my claim was a necessary step to safeguard my interests and provide a transparent record of my holdings.
3. Liquidation Process as a Liquidity Event: The ongoing Chapter 7 liquidation process qualifies as a liquidity event for Astralabs. As a result, I stand to be impacted as both a beneficiary and a

creditor. My claim is essential to assert my rights in this situation and to ensure that I am appropriately treated as a creditor during the liquidation process.

In light of these reasons, I respectfully request that the Court considers my claim seriously and takes into account the circumstances surrounding Astralabs' financial situation. I am prepared to provide any additional information or documentation necessary to support my claims fully.

Sincerely,



Fernando Moreno Cortina
2401 Aldrich St, Apt 367
Austin, TX 78723
(734) 881-4346
fmorenocortina@gmail.com